

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

The Estate of Zerihun Wolde, individually and  
as assignee and Lacks Beach Service,  
individually and as assignor,

Plaintiffs,

versus.

Arch Specialty Insurance Company; Arch  
Insurance Company; Arch Insurance Group,  
Inc. and Brian McMahon, individually,

Defendants.

C.A. NO.: 4:23-cv-03710-JD

**DEFENDANT'S EXPERT DISCLOSURE**

In accordance with the Amended Scheduling Order of the Court dated December 18,  
2023 [ECF 25], the Defendants identifies the following expert witnesses to be used in this case:

(1) Pursuant to Rule 26(a)(2)(B):

Thomas H. Hesse  
1629 Meeting Street, Suite A  
Charleston, South Carolina 29405  
(843) 727-2250

A copy of Mr. Hesse's report is attached hereto as Exhibit 1 and the undersigned certified it is  
being served upon counsel for the Plaintiff this date. Pursuant to Local Rule 16.02, the disclosure  
is filed with the Court, but Exhibit 1 is not being filed with the Court as instructed by Local Rule  
16.02(C)(5) n. 10.

Christopher W. Martin  
808 Travis Street, Suite 1100  
Houston, Texas  
713-632-1700

A copy of Mr. Martin's report is attached hereto as Exhibit 2 and the undersigned certified it is  
being served upon counsel for the Plaintiff this date. Pursuant to Local Rule 16.02, the disclosure

is filed with the Court, but Exhibit 2 is not being filed with the Court as instructed by Local Rule 16.02(C)(5) n. 10.

(2) As the Court and the Plaintiffs are aware, outstanding discovery motions and related issues impact the scope of the materials available for review and use in this case by the parties and their experts. Accordingly, the Defendants intend to name additional expert witnesses as well as amend the reports identified above when the Court issues its opinion on the outstanding motions to compel and protective orders governing the production of materials generated in the underlying tort lawsuit. Those witnesses may include an insurance industry expert to explain insurance to the jury, its purposes, its limitations, and how the transfer of risk and assumptions of risk work. Additionally, it is anticipated that the Defendants may retain an attorney to opine on whether the defense counsel litigation reports were objectively reasonable, but that expert cannot be retained or identified until there is the ability for the Defendants to provide that witness with the information currently being withheld from discovery as outlined in the multiple pending motions.

Dated this 15th day of July, 2024.

WALL TEMPLETON & HALDRUP, PA

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**Attorneys for Defendants**